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December 15, 2023

**VIA ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*, No. 23 Civ. 1471 (JMF)**

Your Honor:

I am a partner at Beldock Levine & Hoffman LLP, counsel representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). On behalf of Plaintiffs, I write to respectfully request a 45-day extension of the December 22, 2023 deadline for Plaintiffs to respond to Defendant's motion for summary judgment. Under the revised briefing schedule, Plaintiffs' opposition brief would be due February 5, 2024 and Defendant's reply, if any, would be due on March 7, 2024.

This is the second request by Plaintiffs for an extension of the briefing schedule, which is necessary due to the two associates on this matter, Jeffrey Kinkle and Katherine Adams, leaving the firm this month. This information was not known to Plaintiffs when we made our previous request for an extension on November 27, 2023. Defendant consents to this request.

We thank the Court for its attention to this matter.

BELDOCK LEVINE & HOFFMAN LLP

Hon. Jesse M. Furman

December 15, 2023

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Respectfully submitted,

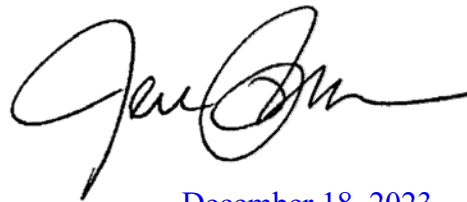


David B. Rankin

cc: Defendant's counsel (by ECF)

Application GRANTED. The Clerk of Court is directed  
to terminate ECF No. 26.

SO ORDERED.



December 18, 2023